

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA, §
 §
v. § No. 3:18-CR-0500-B-01
 §
CHRISTOPHER AUNDRE FAULKNER §

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JANE J. BOYLE, DISTRICT JUDGE, UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS, DALLAS DIVISION:

NOW COMES the Defendant, Christopher Aundre Faulkner, by and through the undersigned counsel, Aaron L. Wiley, and respectfully requests that the sentencing and all filings and responses be continued for approximately 60 days, and in support thereof would show:

I.

Mr. Faulkner's sentencing is currently set for June 2, 2021. (Doc. No. 140). The undersigned attorney was appointed to replace CJA lawyer Kevin Ross on December 14, 2020. (Doc. No. 136). When the undersigned attorney was appointed – Mr. Faulkner was in solitary at Seagoville Detention Center (Seagoville). Following two unsuccessful attempts to see my client - the undersigned was able to initially meet in person with Mr. Faulkner at Seagoville on January 1, 2021. Shortly after our initial meeting – Mr. Faulkner was unexpectedly moved from Seagoville to Dallas County Detention Facility (DCDF).

The undersigned has since visited with Mr. Faulkner a total of four times in DCDF. During each visit my client was in a different location (tower) and each successive visit became increasingly difficult. In fact – during one of our last visits DCDF detention officers prohibited the undersigned and a United States Probation Officer (USPO) from seeing my client. Ultimately, the undersigned and the USPO were able to conduct a Supplemental Presentence Investigation interview of Mr. Faulkner with the assistance of the DCDF Deputy Chief.

Since that time, my client was again been unexpectedly moved to yet another detention facility. This time my client is being housed (in quarantine) at the Limestone County Detention Facility. Limestone is two and a half hour from Dallas and Mr. Faulkner is not expected to be released from quarantine until June 4, 2021.

Clearly given the scope and magnitude of the evidence in this case, it is necessary that the undersigned and Mr. Faulkner have more time to prepare for sentencing. We have not had adequate time to review the evidence and Pre-sentence Report. This request for continuance is not for purposes of delay.

Counsel for the Government states that they are ready for sentencing; but does not oppose the requested continuance.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully prays that the sentencing presently set for June 2, 2021, be continued for 60 days or more.

Respectfully submitted,

By: /s/ Aaron L. Wiley
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ATTORNEY FOR DEFENDANT
CHRISTOPHER FAULKNER

CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Marcus Busch
Assistant United States Attorney
United States Attorney's
Office 1100 Commerce
Street, Third Floor Dallas,
Texas 75242.

/s/ Aaron L. Wiley
Aaron L. Wiley

CERTIFICATE OF CONFERENCE

I, Aaron L. Wiley, hereby certify that I have previously conferred with Mr. Marcus Busch, Assistant United States Attorney, in connection with the above Motion for Continuance, and he does not oppose this motion.

/s/ Aaron L. Wiley
Aaron L. Wiley